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Attorneys For Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

15 VICTOR RIVERA RIVERA, et al., individually and
on behalf of all other persons similarly situated,

Case No.: 3:11-CV-00118-RCJ-VPC

Plaintiffs.

V

PERI & SONS FARMS INC

Defendant

STIPULATION AND PROPOSED ORDER

23 1. On April 13, 2015, this Court preliminarily approved the class-wide settlement of
24 Plaintiffs' claims in the above-captioned case. (Dkt. No. 168). Plaintiffs now ask the Court to
25 extend the claim-filing deadline to December 9, 2015 to permit additional Class Members to
26 receive settlement payments from the approved Settlement Fund. Defendant agrees to Plaintiffs'
27 request.

1 2. Since preliminary approval, the Plaintiffs have been implementing the notice plan
2 set out in the parties' Settlement Agreement. Settlement administrator Justicia Cruzando
3 Fronteras, Inc. ("JCF") has conducted in-person outreach and held approximately seventeen
4 large-scale, widely-publicized meetings in locations including Casimiro Castillo, Jalisco;
5 Guadalajara, Jalisco; Toliman, Queretaro; Peñamiller, Queretaro; and Santa Catarina,
6 Guanajuato. Through these meetings and outreach efforts, JCF has distributed written notice of
7 the settlement to hundreds of Class Members throughout Mexico.

8 3. Beyond the in-person notice conducted by JCF, settlement administrator Centro
9 Derechos Migrantes ("CDM") has mailed notice to more than 900 Class Members and emailed
10 and faxed notice to an additional approximately 40 Class Members residing in Mexico, and
11 settlement administrator Simpluris has mailed or distributed notice to approximately 1,000 Class
12 Members residing in the United States or working at Peri this season.

13 4. To date, over 1,200 out of approximately 2,170 Class Members entitled to receive
14 settlement payments have submitted valid claim forms. However, because of the difficulties
15 associated with delivering mail in rural Mexico all three Settlement Administrators continue to
16 receive inquiries from Class Members who recently learned about the settlement and are
17 interested in submitting claim forms.

18 5. Given that the Court's final approval hearing is not scheduled until December 14,
19 2015, Plaintiffs ask the Court to extend the claim filing deadline by 25 days, from November 13,
20 2015 until December 9, 2015. The extended deadline will increase the number of Class Members
21 who can participate in the Settlement and will not significantly reduce other Class Members'
22 recovery.

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1 DATED this 25th day of November, 2015.

2 **HUGHES SOCOL PIERS
RESNICK & DYM, LTD.**

3 /s/ Christopher J. Wilmes

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18 *Attorneys for Plaintiffs*

DATED this 25th day of November, 2015

SANTORO WHITMIRE

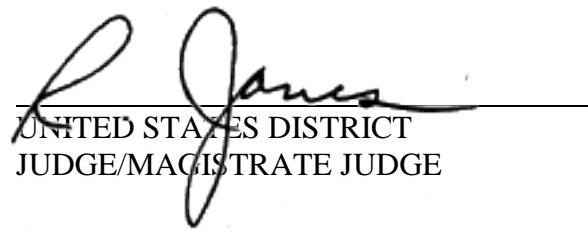
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*Attorney for Defendant Peri & Sons
Farms, Inc.*

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2 **ORDER**
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4 IT IS SO ORDERED this 3rd day of December, 2015.
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9 UNITED STATES DISTRICT
10 JUDGE/MAGISTRATE JUDGE
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